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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FREDDY M. MOROCHO, WALTER
TACURE on behalf
of themselves and others
similarly situated,

Plaintiffs,

- against -

GEORGE C. KELLY, and NYACK
COLONIAL CAR WASH, INC.

Defendants.

INDEX NUMBER: 07 CIV. 2979
(MDF) (CLB)

NOTICE OF MOTION TO AMEND
COMPLAINT

TO: Louis R. Satriale, Esq.
Gehring & Satriale LLC
370 Lexington Avenue
Suite 1200
New York, New York 10017

PLEASE TAKE NOTICE that as soon that as counsel may be heard, Plaintiffs, Freddy Morocho, Walter Tacuri (improperly pleaded as "Walter Tacure"), shall move before The Honorable Charles L. Brieant U.S.D.J., at The United States Courthouse, Room 275, White Plains, N.Y. 10601 for an Order permitting Plaintiffs to amend their Complaint, pursuant to Federal Rule of Civil Procedure

15, and to add parties to the complaint, pursuant to Federal Rule of Civil Procedure 21.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Affidavit of Karen L. Zdanis, Esq., the Affidavit of Freddy Morocho, and the enclosed Brief in support of their motion to file and serve an Amended Complaint.

PLEASE TAKE FURTHER NOTICE that Plaintiffs waive oral argument in connection with this motion.

KAREN L. ZDANIS, ESQ.

_____/s/_____
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Dated: March 5, 2008